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RAMESH "SUNNY" BALWANI

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

RAMESH "SUNNY" BALWANI,
Defendant.

Case No. 18-CR-00258-EJD

**DECLARATION OF JEFFREY B.
COOPERSMITH IN SUPPORT OF
DEFENDANT RAMESH "SUNNY"
BALWANI'S ADMINISTRATIVE
MOTION TO CLARIFY COURT'S
ORDER REGARDING REPORTING
DATE**

Hon. Edward J. Davila

DECLARATION OF JEFFREY B. COOPERSMITH

I, Jeffrey B. Coopersmith, declare as follows:

1. I am counsel for defendant Ramesh “Sunny” Balwani in the above-captioned case. I submit this declaration in support of Mr. Balwani’s Administrative Motion to Clarify the Court’s Order Regarding Reporting Date. I have personal knowledge of the facts stated herein.
2. On March 8, 2023, pursuant to Local Civil Rule 7-11(a), I contacted counsel for the government by email at 2:33 p.m. PST. My email attached the draft Motion and Proposed Order and asked whether the government is willing to stipulate to the relief sought. I asked for a response by 4:30 p.m. PST.
3. I have not heard back from the government counsel, but I am not criticizing them in any way in light of my request for a response within two hours of my email.
4. Because of the imminent Bureau of Prisons reporting date, and the potential need to seek relief in the Court of Appeals, the government’s position on whether they would stipulate could not be obtained.

I declare under penalty of perjury that the foregoing is true and correct.

Executed March 8, 2023, at Seattle, Washington.

/s/ Jeffrey B. Coopersmith

JEFFREY B. COOPERSMITH